The widespread implementation of BPL, even at the present Part 15 radiation limits, has a grave potential to cause interferrence to existing radio services, especially those operating in the HF spectrum. The Part 15 limits works for existing technology because the frequencies used and the coverage is rather limited. This would not be the case with BPL.

While notching interferring frequencies may be technically feasible, it is most certainly not practical. Essentially this places the burden on the licensed service to identify the source of the interferrence and to deal with the local BPL operators to notch the all of the interferring frequencies. The BPL operators will not have the personnel available to perform the necessary notching, testing, and evaluation for a large number of complaints. Small users like individual Amateur Radio Operators will likely be ignored by the BPL operators and that will result in a flood of interferrence complaints to the FCC.

On the surface BPL appears to be an "easy fix" to the problem of broad-band distribution. The costs in term of polution to a limited national resource, our HF radio spectrum, is far too high however. There are more suitable technologies (fiber optic or satellite for example) available for the distribution of broad-band and these would not polute the radio spectrum.

I would encourage the FCC to require the BPL operators to perform more comprehensive interferrence testing with the cooperation of present HF spectrum users like the NTIA (for Federal users), ARRL (for Amateur Radio operators), and DOD (for Military users) before considering authorizing the wide-spread implementation of BPL. It is not sufficient for BPL operators to put up a limited test site and then claim no interferrence potential because they haven't received any complaints when they have no idea if there are any active users within the test site area. Valid testing would require the BPL operators to contact HF radio users in the test area and ask them to specifically listen for interferrence and report any interferrence or lack of interferrence.